

Facility Name: **Caroliona Skiff, LLC**
City: Waycross
County: Ware
AIRS #: 04-13-299-00045

Application #: TV-40571
Date Application Received: November 24, 2015
Permit No: 3732-299-0045-V-07-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Carolina Skiff, LLC** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification****1. Facility Name:**

Carolina Skiff, LLC

2. Parent/Holding Company Name

Carolina Skiff, LLC

3. Previous and/or Other Name(s)

Carolina Skiff, Inc.

4. Facility Location

3231 Fulford Road, Waycross, Georgia 31503

5. Attainment, Non-attainment Area Location, or Contributing Area

Carolina Skiff, LLC (hereinafter "facility") is located in Ware County, which is in attainment for all criteria pollutants.

B. Site Determination

There are no applicable issues with regard to the site determination. There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3732-299-0045-V-06-0	June 8, 2011	Title V Renewal Permit.
3732-299-0045-V-06-1	October 22, 2015	502(b)(10) permit for installing Dust Collector DC01 and removal of all water wash operations (ID Nos. WB01, WB21, and WB51).
3732-299-0045-V-06-2	November 12, 2015	502(b)(10) permit for addition of a new boat manufacturing line (ID Nos. GE41, CH41, KP41, and GT41).

D. Process Description

1. SIC Codes(s)

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The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures fiberglass boats.

3. Overall Facility Process Description

Caroline Skiff, LLC manufactures fiberglass boats. The molds (hulls) are cleaned and waxed, and a layer of gel coat is sprayed on the molds and is allowed to cure. A thin layer of resin (skin coat) is then applied over the first layer of gel coat. The skin coat aids in the adhesion of the gel coat to the resin. The boat hulls enter the lamination process. Layers of unfilled resin, chopped fiberglass strands, and glass mat are applied to the bottom and the sides of the boat. Usually several layers of resin/fiberglass make up the laminate. Once the layers of lamination have cured, a layer of foam is applied to the sides and corners of the boat hull. The molded piece is then removed from the mold and trimmed. The boat deck and hulls are then assembled, and the motor and all necessary wiring and furniture are installed.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is located in Ware County, an attainment area for all criteria pollutants. The facility-wide volatile organic compound (VOC) potential-to-emit (PTE) is capped below 249 tons per year (tpy). Since the PTE for VOC and all other criteria pollutants is each less than the PSD major source of 250 tpy, the facility is currently not major under PSD regulations.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	No			
VOC	Yes	✓		
NO _x	No			
CO	No			
TRS	No			
H ₂ S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		
Total GHGs	No			

The VOC and single/combined hazardous air pollutant (HAP) emissions are each capped below 249 tpy by Condition 2.1.1. Therefore, the facility is major for VOC and single/combined HAP under Title V of 1990 CAAA.

Since the sources of all particulate matter (PM/PM₁₀/PM_{2.5}) are fully enclosed and are controlled by filters, the Division believes that the facility's PM/PM₁₀/PM_{2.5} emissions are less than 100 tpy, each.

3. MACT Standards

Since the facility is major for single/combined HAP (primarily styrene) under Title V of 1990 CAAA, the facility is subject to 40 CFR 63 Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing." Please see Section III.C. for detailed discussion.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

As discussed previously, the facility has an emission cap of <249 tpy of VOC. The emission cap makes the facility not major under PSD regulations.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

A review of the application and facility inspection and reporting records indicate that the facility has no issues of noncompliance.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.1.1 contains a VOC emission limit of <249 tpy. This is required to avoid the major source category under PSD regulations for the facility.

III. Regulated Equipment Requirements

A. Brief Process Description

Please see Section I.D.3. of this narrative for the facility's process description.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Building #1					
GE01	Gel Coat Spray Area Installed on 12/15/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18	F101 – F113	Filter Media
CH01	Resin/Chop Spray Area Installed on 11/11/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
KP01	Putty Bonding Station #1 Installed on 11/15/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
GT01	Grind and Trim Area Installed on 11/15/1989	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.1 through 6.2.4	DC01	Dust Collector
Building #2					
GE21	Gel Coat Spray Area Installed on 12/15/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18	F201 – F225	Filter Media
CH21	Resin/Chop Spray Area Installed on 11/17/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
KP21	Keel Putty Lay-up Area Installed on 12/15/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
GT21	Grind and Trim Area Installed on 12/15/1989	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 6.1.7, 6.2.1 through 6.2.4		
Building #4					
GE41	Gel Coat Spray Area Installed on 12/15/1989	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18	F401 – F410	Filter Media
CH41	Resin/Chop Spray Area Installed on 11/15/2007	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
KP41	Keel Putty Lay-up Area Installed on 5/15/2007	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
GT41	Grind and Trim Area Installed on 5/15/2007	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 6.1.7, 6.2.1 through 6.2.4		

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Building #5					
GE51	Gel Coat Spray Area Installed on 5/18/2007	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18	F501 – F510	Filter Media
CH51	Resin/Chop Spray Area Installed on 12/1/2015	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
KP51	Keel Putty Lay-up Area Installed on 12/1/2015	40 CFR 63 Subpart A 40 CFR 63 Subpart VVVV 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.8, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.1 through 6.2.18		
GT51	Grind and Trim Area Installed on 12/15/2015	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 3.5.2, 5.2.4, 6.1.7, 6.2.1 through 6.2.4		

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

C. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

40 CFR 63 Subpart VVVV National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

Per 40 CFR 63.5680(a) and 63.5683(a), the facility is subject to 40 CFR 63 Subpart VVVV because it is a boat manufacturing facility located at a major source of HAP emissions. According to 40 CFR 63.5692(a) and (b), the facility is an existing source because it was constructed before July 14, 2000. 40 CFR 63.5689 contains a list of boat manufacturing processes that are subject to the 40 CFR 63 Subpart VVVV requirements.

Standards for Open Molding Resin and Gel Coat Operations

40 CFR 63.5698(b) contains an equation for computing the annual HAP emission limit from open molding operations. This is included in Condition 3.3.2.

40 CFR 63.5698(d) includes three kinds of materials that are exempt from the HAP emission limit specified in 40 CFR 63.5698(b) and associated record keeping requirements. These requirements are included in Conditions 3.3.4 and 6.2.5.

40 CFR 63.5701 allows the facility to use three different options to comply with the HAP emission limit specified in 40 CFR 63.5698(b). Since the facility does not own and operate any of the add-on control devices specified in 40 CFR 63 Subpart VVVV, the facility only has the two options in 40 CFR 63.5701(a) and (b). These are included in Condition 3.3.3.

For the compliance option of 40 CFR 63.5701(a), 40 CFR 63.5704(a) includes the general requirement for complying with the HAP emission limit. The requirements are included in Condition 6.2.6.

For the compliance option of 40 CFR 63.5701(b), 40 CFR 63.5704(b) includes the general requirement for complying with the HAP emission limit. The requirements are included in Condition 6.2.7.

40 CFR 63.5707 includes the requirements for an implementation plan. These are included in Condition 6.2.8.

40 CFR 63.5710 includes the compliance methodologies for the emission averaging option of 40 CFR 63.5701(a). These are included in Condition 6.2.9.

40 CFR 63.5713 and Table 2 to 40 CFR 63 Subpart VVVV includes the compliance methodologies for the compliant material option of 40 CFR 63.5701(b). These are included in Condition 6.2.10.

40 CFR 63.5714 includes the compliance methodologies for using filled resins. These are included in Condition 6.2.11.

Standards for Resin and Gel Coat Mixing Operations

40 CFR 63.5731(a) includes the work practice standard for resin and gel coat mixing operations, while 40 CFR 63.5731(b) lists what activities are exempt from the standard. These are included in Condition 3.3.5.

40 CFR 63.5731(c) contains the visual inspection requirement for the work practice standard. This is included in Condition 5.2.5.

40 CFR 63.5731(d) includes the record keeping requirements for meeting the work practice standard. This is included in Condition 6.2.12.

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

40 CFR 63.5734(a) and (b) contains the standards for the resin and gel application equipment cleaning operations. These are included in Conditions 3.3.6 and 3.3.7.

40 CFR 63.5737(c) includes the visual inspection requirement for the standard specified in 40 CFR 63.5734(b). This is included in Condition 5.2.6.

40 CFR 63.5737(a) and (b) includes the record keeping requirements for compliance demonstration for the standard specified in 40 CFR 63.5734(a). These are included in Condition 6.2.13.

Standards for Carpet and Fabric Adhesive Operations

40 CFR 63.5740(a) includes the standard for the carpet and fabric adhesive operations. This is included in Condition 3.3.8.

40 CFR 63.5740(b) includes the record keeping requirements for demonstrating compliance. This is included in Condition 6.2.14.

Methods for Determining Hazardous Air Pollutant Content

40 CFR 63.5758(a)(1) through (3) contains the reference methods and ASTM method for determining HAP content. The testing methods are noted in Condition 4.1.3.

40 CFR 63.5758(a)(5) includes the compliance determination requirements when the facility opts to use HAP content information provided by the supplier or manufacturer. These are included in Condition 6.2.15.

Notifications, Reports, and Records

40 CFR 63.5764 includes the reporting requirements for the facility. These are included in Condition 6.2.18.

40 CFR 63.5767 and 63.5770 includes the general record keeping requirements for the facility. These are included in Conditions 6.2.16 and 6.2.17.

Georgia State Rules

Each of the facility's manufacturing processes are subject to Georgia Air Quality Control Rule 391-3-1-.02(2)(b) "Visible Emissions" and 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes." GA Rule (b) specifies the visible emission (opacity) limit, while GA Rule (e) specifies the PM emission limit for each process. The limits are specified in Conditions 3.4.1 and 3.4.2. Since the processes are indoor and are controlled by filters, the facility is expected to comply with both rules.

The facility is also subject to the fugitive dust requirements specified in Georgia Air Quality Control Rule 391-3-1-.02(2)(n). These requirements are included in Conditions 3.4.3 and 3.4.4.

In addition, Conditions 3.5.1 and 3.5.2 requires that the facility operate all the control devices during the operation of the associated emission units.

D. Compliance Status

See Section II.C above.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.3.1 subjects the gel coat spray areas (ID Nos. GE01, GE21, GE41, and GE51), resin/chop spray areas (ID Nos. CH01, CH21, CH41, and CH51), putty bonding station No. 1 (ID No. KP01), and keel putty lay-up areas (ID Nos. KP21, KP41, and KP51) to 40 CFR 63 Subpart A and Subpart VVVV.

Per 40 CFR 63.5698(b), Condition 3.3.2 includes the annual HAP emission limit for the open molding resin and gel coat operations.

Condition 3.3.3 includes the compliance options allowed in 40 CFR 63.5701.

Condition 3.3.4 lists the materials that are exempt from the HAP emission limit set in Condition 3.3.2.

Condition 3.3.5 includes the work practice standard specified in 40 CFR 63.5731(a) and (b).

Conditions 3.3.6 and 3.3.7 include the standards specified in 40 CFR 63.5734(a) and (b) for the resin and gel coat application equipment cleaning operations.

Condition 3.3.8 includes the standard specified in 40 CFR 63.5740(a) for the carpet and fabric adhesive operations.

Condition 3.4.1 includes the GA Rule (b) visible emission limit.

Condition 3.4.2 includes the GA Rule (e) PM emission limits.

Conditions 3.4.3 and 3.4.4 includes the GA Rule (n) fugitive dust requirements.

Condition 3.5.1 requires that the facility operate the dust collector (ID No. DC01) at all times during the operation of the grind and trim area (ID No. GT01). The facility must also maintain an inventory of filter bags to replace any defective ones.

Condition 3.5.2 requires that the facility operate the filter media at all times during the operation of the associated emission units. The facility must also change the filters at least once per week of operation.

Note that Application No. TV-40571 does not include any water baths (ID Nos. WB01, WB21, and WB51) as the control devices. Therefore, Condition 3.5.1 no longer includes any requirements for the water baths.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

None applicable.

2. Equipment Groups (all subject to the same test requirements):

Condition 4.1.3 has been modified to include the 40 CFR 63 Subpart VVVV associated testing methods.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

The conditions in Section 5.2 of Title V Permit No. 3732-299-0045-V-06-0 and its amendments have been re-organized and included in the proposed Title V renewal permit. These conditions have been re-numbered more logically. The following table illustrates the relationship between conditions in Section 5.2 of the previous permits and the Title V renewal permit. Explanations of current permit conditions are included after the table.

Table 3: Condition (in Section 5.2) Comparison between Title V Permit No. 3732-299-0045-V-06-0 (Including the Two 502(b)(10) Permits) and the Proposed Title V Renewal Permit		
Old Condition No.	Title V Permit/502(b)(10) Permit No. That Included such Condition	New Condition No.
5.2.1	3732-299-0045-V-06-0	No Longer Included in the Permit
5.2.2	3732-299-0045-V-06-0	5.2.4
5.2.3	3732-299-0045-V-06-0	5.2.5
5.2.4	3732-299-0045-V-06-0	5.2.6
5.2.5	3732-299-0045-V-06-0	No Longer Included in the Permit
5.2.6	3732-299-0045-V-06-1	5.2.1
5.2.7	3732-299-0045-V-06-1	5.2.2
5.2.8	3732-299-0045-V-06-1	5.2.3
5.2.9	3732-299-0045-V-06-2	5.2.4

1. Individual Equipment:

Condition 5.2.1 now requires that the facility monitor the pressure drop across the dust collector (ID No. DC01) on a weekly basis and ensure that the pressure drop is in the range recommended by the manufacturer.

Condition 5.2.2 requires that the Permittee perform a daily visible emission checks on the dust collector (ID No. DC01) exhaust and take corrective action whenever visible emissions are observed from the dust collector stack.

Condition 5.2.3 requires that the Permittee develop and implement a Preventive Maintenance Plan (PMP) for the dust collector DC01. Note that during the most recent inspection tour by the Division's compliance engineer, Mr. Jae Pyo, in February 2016, the PMP has not been developed yet because DC01 has not started up at that time.

2. Equipment Groups (all subject to the same monitoring requirements):

Note that Application No. TV-40571 does not include any water baths (ID Nos. WB01, WB21, and WB51) as the control devices. Therefore, the monitoring requirements specified in existing Conditions 5.2.1 and 5.2.5 are no longer necessary and are not included in the proposed Title V renewal permit.

Condition 5.2.4 requires that the Permittee keep records of the fiberglass filter changes in a maintenance log on site for five years.

Condition 5.2.5 includes the visual inspection requirements specified in 40 CFR 63.5731(c).

Condition 5.2.6 includes the visual inspection requirements specified in 40 CFR 63.5737(c).

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant. [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

All of the emission units are fully enclosed and generate little PM emissions. They are equipped with either filter media or a dust collector, which are used to control only fugitive PM emissions. Although these emission units are subject to the GA Rule (e) PM emission limit, they do not rely on the filter media and dust collector to achieve compliance. Therefore, the facility is not subject to any CAM requirement.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

The conditions in Section 6 of Title V Permit No. 3732-299-0045-V-06-0 and its amendments have been re-organized and included in the proposed Title V renewal permit. These conditions have been re-numbered more logically. The following table illustrates the relationship between conditions in Section 6 of the previous permits and the Title V renewal permit. Explanations of current permit conditions are included after the table.

Table 4: Condition (in Section 6) Comparison between Title V Permit No. 3732-299-0045-V-06-0 (Including the Two 502(b)(10) Permits) and the Proposed Title V Renewal Permit		
Old Condition No.	Title V Permit/502(b)(10) Permit No. That Included such Condition	New Condition No.
6.1.7b.i.	3732-299-0045-V-06-0	6.1.7b.i.
6.1.7b.ii.	3732-299-0045-V-06-0	6.1.7b.ii.
6.1.7b.iii.	3732-299-0045-V-06-0	6.1.7b.iii.
6.1.7b.iv.	3732-299-0045-V-06-0	6.1.7b.v.
6.1.7b.v.	3732-299-0045-V-06-0	6.1.7b.viii.
6.1.7b.vi.	3732-299-0045-V-06-0	6.1.7b.iv.
6.1.7b.vii.	3732-299-0045-V-06-0	6.1.7b.vi.
6.1.7b.viii.	3732-299-0045-V-06-0	6.1.7b.vii.
6.1.7c.i.	3732-299-0045-V-06-0	No Longer Included in the Permit
6.1.7c.ii.	3732-299-0045-V-06-0	6.1.7c.i.
6.1.7c.iii.	3732-299-0045-V-06-0	6.1.7c.iv.
6.1.7c.iv.	3732-299-0045-V-06-0	6.1.7c.v.
6.1.7c.v.	3732-299-0045-V-06-0	No Longer Included in the Permit
6.1.8c.i.	3732-299-0045-V-06-1	6.1.7c.iii.
6.1.9c.i.	3732-299-0045-V-06-2	6.1.7c.i.
6.2.1	3732-299-0045-V-06-0	6.2.5
6.2.2	3732-299-0045-V-06-0	6.2.6
6.2.3	3732-299-0045-V-06-0	6.2.7
6.2.4	3732-299-0045-V-06-0	6.2.8
6.2.5	3732-299-0045-V-06-0	6.2.10

Table 4: Condition (in Section 6) Comparison between Title V Permit No. 3732-299-0045-V-06-0 (Including the Two 502(b)(10) Permits) and the Proposed Title V Renewal Permit		
Old Condition No.	Title V Permit/502(b)(10) Permit No. That Included such Condition	New Condition No.
6.2.6	3732-299-0045-V-06-0	6.2.9
6.2.7	3732-299-0045-V-06-0	6.2.11
6.2.8	3732-299-0045-V-06-0	6.2.13a. and b.
6.2.9	3732-299-0045-V-06-0	6.2.14
6.2.10	3732-299-0045-V-06-0	6.2.16
6.2.11	3732-299-0045-V-06-0	6.2.17
6.2.12	3732-299-0045-V-06-0	6.2.18
6.2.13	3732-299-0045-V-06-0	6.2.15
6.2.14	3732-299-0045-V-06-0	6.2.12
6.2.15	3732-299-0045-V-06-0	6.2.13c.
6.2.16	3732-299-0045-V-06-0	6.2.1
6.2.17	3732-299-0045-V-06-0	6.2.2
6.2.18	3732-299-0045-V-06-0	6.2.4
6.2.19	3732-299-0045-V-06-0	6.2.3

Note that Application No. TV-40571 does not include any water baths (ID Nos. WB01, WB21, and WB51) as the control devices. Therefore, the excursion reporting requirements specified in existing Conditions 6.1.7c.i. and 6.1.7c.v. are no longer necessary and are not included in the proposed Title V renewal permit.

Condition 6.1.7 now includes the following definitions of exceedances and excursions:

- Subparagraph b.i. defines an exceedance as any consecutive 12-month period in which VOC emissions from the entire facility equal or exceed 249 tons, as calculated in Condition 6.2.4.
- Subparagraphs b.ii. through viii. include provisions defining exceedances for the requirements of 40 CFR 63 Subpart VVVV.
- Subparagraph c.i. defines an excursion as any filter change not performed per Condition 3.5.2.
- Subparagraph c.ii. defines an excursion as any weekly measurement of pressure drop across the dust collector (ID No. DC01), measured and recorded in accordance with Conditions 5.2.1 and 5.2.3, that is outside the appropriate range specified in Condition 5.2.3a.
- Subparagraph c.iii. defines an excursion as any two consecutive daily determinations of visible emissions requiring action by Condition 5.2.2a. from the dust collector (ID Nos. DC01).
- Subparagraph c.iv. defines an excursion as any failure to conduct the visual inspection required by Condition No. 5.2.5.

- Subparagraph c.v. defines an excursion as any failure to conduct the visual inspection required by Condition No. 5.2.6.

Condition 6.2.1 requires the facility to maintain monthly usage records of all VOC containing compounds utilized at the facility.

Condition 6.2.2 requires the facility to calculate the monthly VOC emissions using the records required in Condition 6.2.1 and the equations specified in Condition 6.2.3. The facility must notify the Division if the VOC emissions for any month exceed 20.75 tons. The facility must utilize the equations/procedures in Condition 6.2.3 for calculating VOC emissions specified in Appendix H of the Division's Procedure for Testing and Monitoring Sources of Air Pollutants.

Condition 6.2.4 requires the facility to calculate the twelve month rolling total VOC emissions for each month and notify the Division when the VOC emissions equal or exceed 249 tons during any consecutive twelve month period. Notification must be submitted within 15 days.

Conditions 6.2.5 through 6.2.18 contains the record keeping and reporting requirements of 40 CFR 63 Subpart VVVV as follows:

- Condition 6.2.5 includes the record keeping requirements specified in 40 CFR 63.5698(d) for exempt materials.
- Condition 6.2.6 includes the record keeping requirements specified in 40 CFR 63.5704(a) for the emission averaging option.
- Condition 6.2.7 includes the record keeping requirements specified in 40 CFR 63.5704(b) for the compliant materials option.
- Condition 6.2.8 includes the requirements for an implementation plan specified in 40 CFR 63.5707.
- Condition 6.2.9 includes the compliance methodologies specified in 40 CFR 63.5710 and Table 3 to 40 CFR 63 Subpart VVVV for the emission averaging option.
- Condition 6.2.10 includes the compliance methodologies specified in 40 CFR 63.5713 and Table 2 to 40 CFR 63 Subpart VVVV for the compliant materials option.
- Condition 6.2.11 includes the compliance methodologies specified in 40 CFR 63.5714 for using filled resins.
- Condition 6.2.12 includes the record keeping requirements specified in 40 CFR 63.5731(d) for the visual inspections required by Condition 5.2.5.
- Condition 6.2.13, per 40 CFR 63.5737, includes the record keeping requirements for compliance demonstration for the standard specified in 40 CFR 63.5734(a).

- Condition 6.2.14, per 40 CFR 63.5740(b), includes the record keeping requirements for demonstrating compliance with the standard for the carpet and fabric adhesive operations in Condition 3.3.8.
- Condition 6.2.15 includes the compliance determination requirements specified in 40 CFR 63.5758(a)(5) when the facility opts to use HAP content information provided by the supplier or manufacturer.
- Conditions 6.2.16 and 6.2.17 includes the general record keeping requirements specified in 40 CFR 63.5767 and 63.5770 for the facility.
- Finally, Condition 6.2.18 includes the reporting requirements specified in 40 CFR 63.5764.

VII. Specific Requirements**A. Operational Flexibility**

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

Refer to <http://gatv.georgiaair.org/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they do not have air conditioners or refrigeration equipment that use CFC's, HFC's, or other stratospheric ozone-depleting substances.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.